

2. The Motion is set on the Court's submission docket for Wednesday, April 29, 2015 (the "*Submission Date*"). See Local Rule 7.3.

3. After receiving the Motion, Ranger requested that Tradeco agree to an extension of the Submission Date for two (2) weeks.

4. Tradeco is unopposed to Ranger's requested extension.

5. Accordingly, Ranger respectfully requests an extension of the Submission Date to Wednesday, May 13, 2015.

6. This unopposed motion is not brought for purposes of delay, but so that justice may be done. Ranger's requested extension will not alter any current deadlines in this case and is made in good faith.

For the foregoing reasons, Ranger respectfully requests that the Court grant this unopposed motion and extend the Submission Date for Defendant's Motion to Wednesday, May 13, 2015.

Dated: April 21, 2015

Respectfully submitted,

/s/ Brett J. Young

Brett J. Young, Attorney in Charge

State Bar No. 24042203

SDOT: 566989

1000 Main Street, Suite 2550

Houston, Texas 77002

713/815-7300 (Telephone)

713/815-7301 (Facsimile)

brett.young@klgates.com

Of Counsel:

Elizabeth A. Gilman

State Bar No. 24069265

SDOT: 006637

beth.gilman@klgates.com

K&L Gates LLP

1000 Main Street, Suite 2550

Houston, Texas 77002

713/815-7300 (Telephone)

713/815-7301 (Facsimile)

**ATTORNEYS FOR PLAINTIFF
RANGER OFFSHORE MEXICO,
S. DE R.L. DE C.V.**

CERTIFICATE OF CONFERENCE

On April 17, 2015, I conferred with counsel for Defendant Tradeco Infraestructura, S.A. de C.V. regarding Plaintiff Ranger Offshore Mexico, S. de R.L. de C.V.'s request for an extension of the Submission Date for Defendant's Motion to Compel Arbitration and for Stay or Dismissal of Litigation to Wednesday, May 13, 2015. Counsel for Tradeco indicated that Tradeco is unopposed to Ranger's requested extension mentioned above.

/s/ Brett J. Young

Brett J. Young

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on the following counsel of record on this 21st day of April 2015 pursuant to Federal Rule of Civil Procedure 5 and Local Rule 5, as follows:

Via CM/ECF System

Michael Bell

Jay T. Huffman

Blank Rome LLP

700 Louisiana Street, Suite 4000

Houston, Texas 77002-2727

Tel 713.402.7630

Fax 713.228.6605

MBell@BlankRome.com

JHuffman@BlankRome.com

Via Fax to 713-652-5130

Brent Vannoy

Johnson DeLuca Kurisky & Gould, P.C.

4 Houston Center

1221 Lamar Street, Suite 1000

Houston, Texas 77010

Tel 713.652.2525

Fax 713.652.5130

BVannoy@jdkglaw.com

/s/ Brett J. Young

Brett J. Young